



HAZARDOUS WASTE MANAGEMENT PROGRAM COMPLIANCE ISSUES

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Presentation Topics

- Perceptions, Perspectives
- Common Mistakes In Waste Management
- Exemptions and Exclusions



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Perceptions, Perspectives

“To the man who only has a hammer in the toolkit, every problem looks like a nail.”

-Abraham Maslow

"We don't like their sound, and guitar music is on the way out."

- Decca Recording Co. rejecting the Beatles,
1962



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Perceptions, Perspectives

What is RCRA?

- A. Really Complicated Regulatory Act**
- B. Resource Conservation and Recovery Act**
- C. Ridiculously Cumbersome Ruthless Act**
- D. All of the Above**



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Perceptions, Perspectives

What is the “Ideal” inspection?

- You have memorized the facility file.
- Your trip to the facility is uneventful and the radio station plays all your favorite songs.
- Facility welcomes you into the site with open arms.
- All of the facility’s paperwork is current and organized.
- Violations are easily documented and the facility personnel admits everything. They sign their name to your notes.
- As a result of your report, the facility promptly writes a check for the full amount of the penalty and thanks you for your service to the citizens of the State of Alabama.

ADEM

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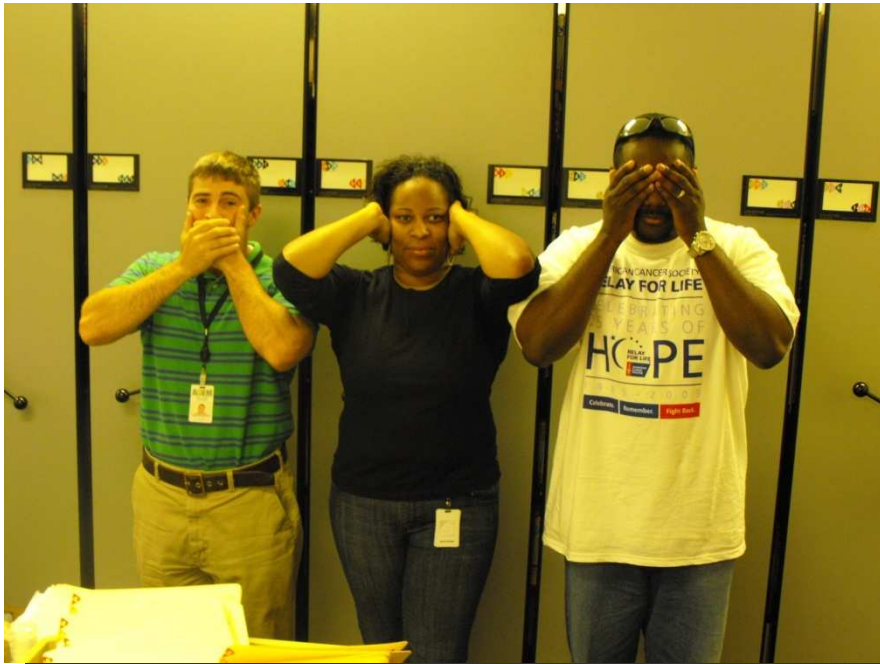
Perceptions, Perspectives





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Perceptions, Perspectives





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Perceptions, Perspectives



Mission: Assure for all citizens of the State a safe, healthful and productive environment



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Keys to Proper Waste Managements



Plan



Train



Execute



Document



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Common Mistakes In Waste Management and How to Avoid Them

1. Lack of a Proper Waste Determination





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Common Mistakes In Waste Management and How to Avoid Them

2. Mismanaged Satellite Accumulation Areas





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Common Mistakes In Waste Management and How to Avoid Them

3. Mislabeled or Unlabeled “Used Oil” Containers





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Common Mistakes In Waste Management and How to Avoid Them

4. Failure to label “Hazardous Waste” Containers



Common Mistakes In Waste Management and How to Avoid Them

5. Lack of Training or Training Documents





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Common Mistakes In Waste Management and How to Avoid Them

6. Failure to Conduct Weekly Container Inspections

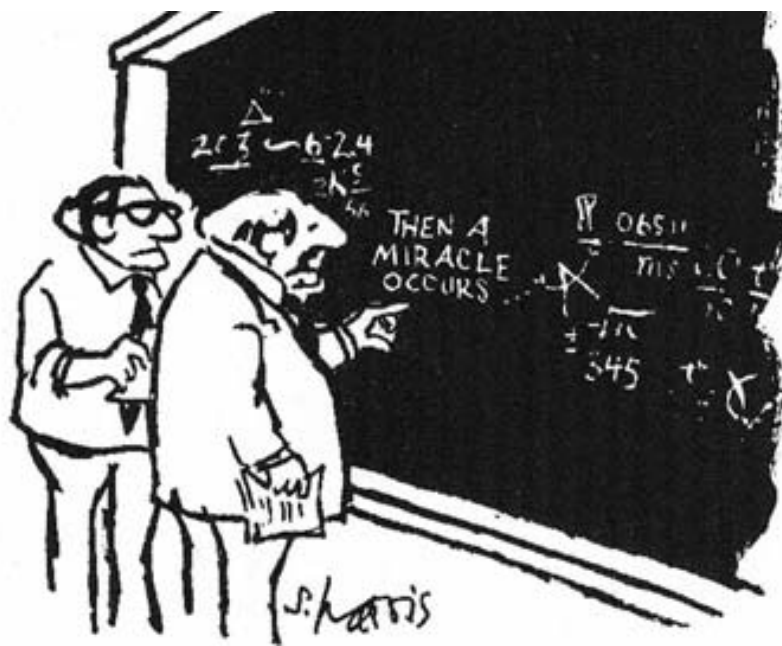




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Common Mistakes In Waste Management and How to Avoid Them

7. Lack of a Proper Contingency Plan



"I think you should be more explicit here in step two."

Source: <http://greenwichroundup.blogspot.com/2009/02/21109-greenwich-time-news-links-updated.html>



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Common Mistakes In Waste Management and How to Avoid Them

8. Inadequate Aisle Space





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Common Mistakes In Waste Management and How to Avoid Them

9. Open Containers





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10. Release of Contaminants





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Common Mistakes In Waste Management and How to Avoid Them

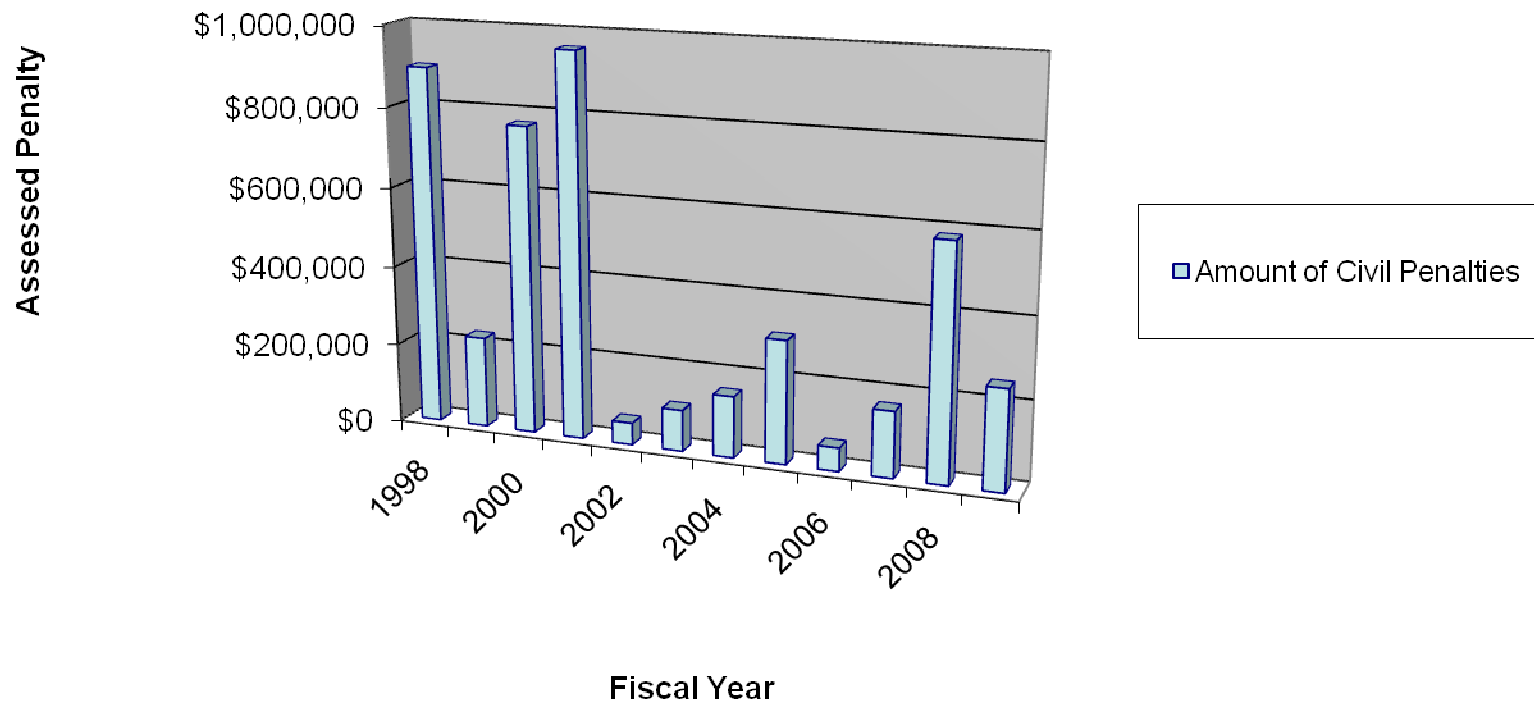
- 1. Lack of a Proper Waste Determination**
- 2. Mismanaged Satellite Accumulation Areas**
- 3. Mislabeled or Unlabeled “Used Oil” Containers**
- 4. Failure to label “Hazardous Waste” Containers**
- 5. Lack of Training or Training Documents**
- 6. Failure to Conduct Weekly Container Inspections**
- 7. Lack of a Proper Contingency Plan**
- 8. Inadequate Aisle Space**
- 9. Open Containers**
- 10. Release of Contaminants**



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The Cost of Non-Compliance

Penalty Amounts (\$) 1998-2009





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The Cost of Non-Compliance



Abandoned Hazardous Waste Site



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The Cost of Non-Compliance



Aircraft Chemical Oxygen Generators



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The Cost of Non-Compliance



EQ Industrial Services Hazardous Waste Facility in Apex, NC



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Pollution Prevention



Source Reduction-
prevent waste from being generated



Recycling/Reuse-
use resources more than once



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Exclusions and Exemptions

Some materials that are excluded from the definition of solid waste (and therefore are NOT hazardous) include:

- Industrial wastewater discharges
- Radioactive waste
- Spent wood preserving solutions that are reclaimed and reused in the wood preserving process
- Processed scrap metal
- Secondary materials, if reclaimed and returned to the original process (totally enclosed).



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Exclusions and Exemptions

Some solid wastes are excluded from the definition of hazardous wastes:

- Household waste (pesticides, cleaners)
- Some agricultural wastes that are returned to the soils as fertilizers
- Cement kiln dust (unless the facility burns hazardous waste as fuel)
- Arsenically treated wood wastes generated from a person using wood for its intended purpose
- Used oil filters that have been hot drained



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Exclusions and Exemptions

Some recycled materials are not classified as solid waste.

- Materials are not solid wastes IF:
 - They are being used as substitutes for commercial products
 - Returned back to the original process without first being reclaimed or land disposed.
- Lab samples collected for lab analysis
- Used oil, if recycled.
- Universal wastes (batteries, mercury-containing thermostats, and electric lamps).



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Exclusions and Exemptions

Specific exclusions from hazardous waste treatment permitting:

- Bulking on-site generated hazardous wastes in tanks or containers
- Evaporation in tanks or containers



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Need Additional Information?

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ADEM Administrative Code Division 335-14:
www.adem.alabama.gov/Regulations/regulations.htm

ADEM Environmental Fact Sheets:
<http://www.adem.alabama.gov/LandDivision/guidance.htm>.